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Counsel for Federal Insurance Company

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LEVY AD GROUP, INC., a Nevada
corporation; LEVY PRODUCTION GROUP,
LLC, a Nevada limited liability company;
LEVY ONLINE, a Nevada limited liability
company,

Plaintiffs,

v.

THE CHUBB CORPORATION dba CHUBB
GROUP OF INSURANCE COMPANIES, a
New Jersey corporation; FEDERAL
INSURANCE COMPANY, an Indiana
corporation,

Defendants.

CASE NO. 2:20-cv-00763-JAD-(DJA)

**THE PARTIES' STIPULATION AND
(PROPOSED) ORDER TO EXTEND
TIME FOR DEFENDANT FEDERAL
TO FILE RESPONSIVE PLEADING
BY 14 DAYS**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by Plaintiffs Levy Ad Group, Levy
Production Group, LLC, and Levy Online ("Levy Entities"), and Defendant Federal Insurance
Company ("Federal"), by and through their respective counsel, that the time for Federal Insurance

Company to file and serve its initial responsive pleadings be extended by fourteen (14) days through and including June 4, 2020.

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule IA 6-1(a), Federal represents that transmission of the file materials necessary to allow Federal to meaningfully respond to the Complaint was delayed as the result of the ongoing COVID-19 pandemic and continuing shelter in place orders and additional time is required for defense counsel to fully analyze the file materials in order to respond appropriately to the Complaint. In addition, counsel for the parties are discussing potential amendment to the Complaint in order to avoid motion practice. Judicial economy supports allowing additional time to plead in response in the Complaint to allow for the potential resolution of the issues that may result in amendment of the Complaint.

Accordingly, the parties hereby agree and stipulate to allow Federal until June 4, 2020 to file its responsive pleading(s). Further, the parties respectfully request this honorable Court enter an Order providing the same.

DATED: May 15, 2020

LAW OFFICE OF BRADLEY L. BOOKE

By: /s/ Bradley L. Boone
 Bradley L. Boone, Esq.
 10161 Park Run Drive, Suite 150
 Las Vegas, NV 89145

Attorney for Plaintiffs

DATED: May 15, 2020


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*Attorneys for Defendant Federal Insurance
 Company*

IT IS SO ORDERED:


 Daniel J. Albregts
 United States Magistrate Judge

DATED: May 18, 2020

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **THE PARTIES' STIPULATION AND (PROPOSED) ORDER TO EXTEND TIME FOR DEFENDANTS TO FILE RESPONSIVE PLEADING BY 14 DAYS (First Request)** was served by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☒ **BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Registered Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: May 15, 2020

/s/ Rita Tuttle
An Employee of Foran Glennon